



February 27, 2019

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. §160(c) to Accelerate Investment in Broadband and Next-Generation Networks* (WC Docket No. 18-141)

Dear Ms. Dortch:

On Monday, February 25, Patrick Halley and Diane Holland of USTelecom; Frank Simone, Jackie Flemming, and Keith Krom of AT&T; Nick Alexander and Craig Brown (by phone) of CenturyLink; Mike Skrivan (by phone) of Consolidated; A.J. Burton of Frontier; and Katharine Saunders and Fred Moacdieh of Verizon met with the following Commission staff from the Wireline Competition Bureau: Terri Natoli, Pamela Arluk, Michele Berlove (by phone), Megan Capasso, Edward Krachmer, Pamela Megna, Claudia Pabo, and Eric Ralph. The same parties who met in person with Bureau staff also met separately with Nick Degani and Nirali Patel, Senior Counsel and Wireline Advisor to Chairman Pai, respectively.

In both meetings, we discussed USTelecom's forbearance Petition seeking relief from certain ILEC unbundling and resale obligations.¹ Specifically, we described evidence cited in the Petition and the record of widespread and pervasive competition in local markets that supports a finding that Section 251(c) unbundling and resale mandates are no longer necessary to protect consumers and competition. We also discussed and, consistent with recent filings in the record,² responded to questions raised in the record alleging potential harms to some customers, including residential customers, if the relief sought is granted. In response to a request from staff,

¹ Petition for Forbearance of USTelecom – the Broadband Association, WC Docket No. 18-141 (filed May 4, 2018).

² See, e.g., Ex Parte Letter from James P. Young, Partner, Sidley Austin LLP, to Marlene H. Dortch, WC Docket No. 18-141 (filed Feb. 21, 2019); Ex Parte Letter from Patrick Halley, USTelecom, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-141 (filed Feb. 11, 2019); Ex Parte Letter from James P. Young, Sidley Austin LLP, Counsel for AT&T, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-141 (filed Dec. 28, 2018); Letter from Frederick E. Moacdieh, Verizon, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 18-141 (filed Sep. 24, 2018).

Ms. Marlene Dortch

February 27, 2019

Page 2

we also discussed the possibility of submitting additional information in the record to further address these questions.

We look forward to continue working with the Commission as it further considers USTelecom's Petition.

Sincerely,

/s/ Patrick Halley

Patrick Halley
Senior Vice President, Advocacy and
Regulatory Affairs

cc (via email):

Nick Degani
Nirali Patel
Terri Natoli
Pam Arluk
Michele Berlove
Megan Capasso
Edward Krachmer
Pamela Megna
Claudia Pabo
Eric Ralph